

PAUL J. ANDRE (State Bar No. 196585)
pandre@kramerlevin.com
LISA KOBIALKA (State Bar No. 191404)
lkobialka@kramerlevin.com
JAMES HANNAH (State Bar No. 237978)
jhannah@kramerlevin.com
KRAMER LEVIN NAFTALIS
& FRANKEL LLP
990 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 752-1700
Facsimile: (650) 752-1800

Counsel for Plaintiff
FINJAN, INC.

JENNIFER A. KASH (Bar No. 203679)
jenniferkash@quinnemauel.com
SEAN PAK (Bar No. 219032)
seanpak@quinnemanuel.com
IMAN LORDGOOEI (Bar No. 251320)
imanlordgooei@quinnemanuel.com
SAM STAKE (Bar No. 257916)
samstake@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
Facsimile: (415) 875-6700

Counsel for Defendants
PROOFPOINT, INC. AND ARMORIZE
TECHNOLOGIES, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FINJAN, INC.,

Plaintiff,

v.

PROOFPOINT, INC. AND ARMORIZE
TECHNOLOGIES, INC.,

Defendants.

Case No.: 13-CV-05808-HSG

**STIPULATION AND ORDER GRANTING
LEAVE TO SUPPLEMENT INVALIDITY
CONTENTIONS**

1 Pursuant to Patent Local Rule 3-6, Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Finjan, Inc.
2 (“Finjan”) and Defendant Proofpoint, Inc. and Armorize Technologies, Inc. (“Defendants”)
3 (collectively, “the Parties”), by and through their respective counsel, hereby stipulate to the following
4 request for leave to amend invalidity contentions served under Patent Local Rule 3-6:

5 WHEREAS, pursuant to Patent Local Rule 3-1, Finjan served its disclosure of asserted claims
6 and infringement contentions (“Infringement Contentions”) on April 17, 2014;

7
8 WHEREAS, pursuant to Patent Local Rule 3-3, Defendants served their Invalidity Contentions
9 on June 9, 2014;

10 WHEREAS, the Court struck Finjan’s infringement contentions, in part, on April 2, 2015, but
11 granted leave, in part, for Finjan to amend its Infringement Contentions by April 23, 2015;

12 WHEREAS, the Court extended the briefing and hearing schedule for claim construction and
13 extended the close of fact discovery to September 2, 2015;

14 WHEREAS, the requested leave should not have any material effect on the remaining schedule
15 in this case;

16
17 WHEREAS, in light of the foregoing, the Parties agreed that there is good cause for
18 Defendants to supplement their invalidity contentions to the extent Finjan’s amended infringement
19 contentions provide new or different interpretation of the asserted claims;

20 NOW THEREFORE, the Parties hereby stipulate to and request an order granting Defendants
21 leave to supplement their invalidity contentions by June 8, 2015 to the extent that Finjan’s amended
22 infringement contentions provide new or different interpretation of the asserted claims.

23
24 **IT IS SO STIPULATED.**

Respectfully submitted,

KRAMER LEVIN NAFTALIS & FRANKEL LLP

Dated: April 17, 2015

/s/ Paul J. Andre

Paul J. Andre (State Bar No. 196585)
Lisa Kobialka (State Bar No. 191404)
James Hannah (State Bar No. 237978)
Hannah Lee (State Bar No. 253197)
KRAMER LEVIN NAFTALIS
& FRANKEL LLP
990 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
pandre@kramerlevin.com
lkobialka@kramerlevin.com
jhannah@kramerlevin.com
hlee@kramerlevin.com

Counsel for Plaintiff
FINJAN, INC.

QUINN EMANUAL URQUHART &
SULLIVAN LLP

Dated: April 17, 2015

/s/ Jennifer A. Kash

Jennifer A. Kash (Bar No. 203679)
Sean Pak (Bar No. 219032)
Iman Lordgooei (Bar No. 251320)
Sam Stake (Bar No. 257916)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, California 94111-4788
Telephone: (415) 875-6600
Facsimile: (415) 875-6700
jenniferkash@quinnemauel.com
seanpak@quinnemanuel.com
imanlordgooei@quinnemanuel.com
samstake@quinnemanuel.com

Counsel for Defendants
PROOFPOINT, INC. AND ARMORIZE
TECHNOLOGIES, INC.

ATTESTATION PURSUANT TO L.R. 5-1(I)

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

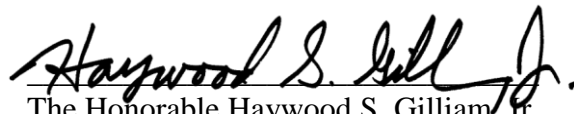
/s/ Jennifer A. Kash
Jennifer A. Kash

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

There being a showing of good cause based on the Parties' stipulation, Proofpoint, Inc. and Armorize Technologies, Inc. may supplement their invalidity contentions by June 8, 2015 to the extent that Finjan's Amended Infringement Contentions provide new or different interpretation of the asserted claims.

DATED: 4/21/2015


The Honorable Haywood S. Gilliam, Jr.
United States District Judge